

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Quemetco, Inc.
7870 W. Morris Street
Indianapolis, Indiana 46231**

ATTENTION:

**Shane Richardson
Environmental Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Quemetco, Inc. (Quemetco or you) to submit certain information about the facility at 7870 W. Morris Street, Indianapolis, Indiana. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Quemetco owns and operates an emission source at the Indianapolis, Indiana, facility. We are requesting this information to determine whether your emission source is complying with the Indiana State Implementation Plan (SIP) and the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Lead Smelters at 40 C.F.R. Part 63, Subpart X.

Quemetco must send all required information to:

Attn: Compliance Tracker, AE-17J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Quemetco must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks to collect information from specific individuals or entities as part of an administrative action or investigation.

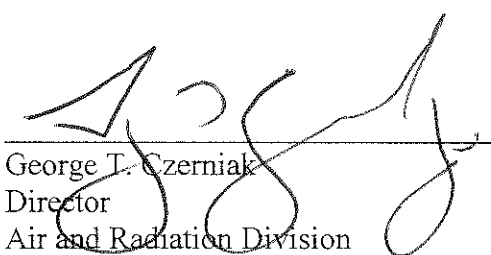
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Quemetco to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Alexandra Letuchy at (312) 886-6035 or letuchy.alexandra@epa.gov.

Date

6/23/15


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. If you have already submitted the information requested below to EPA, there is no need to reproduce the information as long as your response identifies the information produced, the date of production, and the manner in which it was provided to EPA.
6. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
7. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.

2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.
3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each disk or drive so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number. In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or the National Emission Standards for Hazardous Air Pollutants for Secondary Lead Smelters at 40 C.F.R. Part 63, Subpart X.

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.
2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Information You Are Required to Submit to EPA

Quemetco must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a), within 30 calendar days after receiving this request.

1. Provide a copy of each current air permit issued to Quemetco by the Indiana Department of Environmental Management (IDEM).
2. Provide a copy of all permit applications submitted to IDEM since June 2010. Also, provide a copy of the original Title V permit application.
3. Provide copies of all annual emissions reports submitted to IDEM for 2010 to the present. Provide a narrative describing the method used for the annual emissions calculations for each pollutant, including the basis of any emissions factors used, description of the assumed/estimated capture efficiencies for each control device(s), and the associated emission unit(s), and any documents outlining procedures for calculating annual emissions.
4. Provide a table listing each emission unit, exhaust point, and associated emission control, if applicable. In the table, include all fugitive emission exhaust points. Additionally, provide a map or aerial view photograph of the facility indicating the location of each emission unit and each exhaust point.
5. Provide copies of any deviation or excess emission reports submitted to IDEM since January 2010.
6. Provide copies of all semi-annual compliance reports submitted to IDEM since June 2010.
7. Provide a list and copies of each emissions test conducted for any reason, from June 2005 to the present. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. Use the following guidelines for compiling the list and preparing copies of the stack tests:
 - a. **Table:** Identify the emissions unit, the date of the test, and the test method(s) used. For each test during which the source was not operating at maximum design capacity, provide an explanation for why production was limited. Indicate whether the report was shared with IDEM.
 - b. **Copies:** Provide full stack test reports, including the summary pages, the section describing the process parameters and production or processing rates at the time of the test, all test runs, and all calculations.
8. Provide copies of all visible emissions readings performed using EPA Method 9 or EPA Method 22 from January 2010 to the present (excluding any readings provided with the reports included with Item 7, above).

9. Provide copies of Notifications of Compliance Status submitted to IDEM or EPA for 40 C.F.R., Part 63, Subpart X.
10. Provide a copy of the fugitive dust control standard operating procedures manual prepared pursuant to 40 C.F.R. § 63.545(a), the standard operating procedures manual for baghouses prepared pursuant to 40 C.F.R. § 63.548(a), and the standard operating procedures designed to minimize emissions of total hydrocarbon from the furnaces for each startup or shutdown scenario anticipated.
11. From January 2014 to the present, provide monthly records of the concentration of lead in each process vent, and the flow-weighted average concentration of lead compounds in vent gases calculated pursuant to 40 C.F.R. § 63.543(a)(2).
12. Provide the following information for each differential pressure monitor used to comply with 40 C.F.R., Part 63, Subpart X:
 - a. Manufacturer's specifications;
 - b. Manufacturer's installation guidance;
 - c. Facility diagram indicating location of each gauge, indicating whether the monitor is mounted on the ceiling or wall;
 - d. Documentation related to the determination of where to locate the differential pressure monitors;
 - e. Photograph of each gauge location;
 - f. Date of installation of each gauge; and
 - g. Calibration records for each gauge.
13. For January 2014 to the present, provide (in an Excel Workbook or other compatible format) rolling 15-minute average readings for each continuous differential pressure monitor for the total enclosure.
14. For June 2005 to the present, provides the following records related to each SO₂ continuous emission monitor (including the unit on the WESP):
 - a. Monthly average SO₂ concentration and average volumetric flow of stack gases;
 - b. CEMS malfunctions;
 - c. Out of control periods;
 - d. Calibration and adjustment activities;
 - e. Repair or maintenance activities; and

- f. pH checks of the scrubber.
15. From October 2013 to the present, provide records of monthly inspections for all barriers on outside openings of areas maintained at negative pressure for compliance with 40 C.F.R., Part 63, Subpart X. Provide documentation of corrective action for any damage observed at barriers.
16. Provide the following information related to each bag leak detection system (BLDS) in use:
- a. The manufacturer's operation and maintenance guidance documents;
 - b. The manufacturer's guidance documents used for establishing alarm setpoints and delay times;
 - c. All operation and maintenance guidance documents developed by Quemetco used for establishing alarm setpoints and delay times;
 - d. The emission point, air pollution control unit, and process associated with each BLDS;
 - e. The alarm setpoints and delays utilized by Quemetco from installation of the BLDS to the present;
 - f. The data used to justify each modification of either an alarm setpoint or delay time and a narrative description of why the modification was appropriate; and
 - g. An electronic record of the BLDS output, from January 2010 to the present.
17. Provide the following information for each baghouse, from January 2010 to the present:
- a. A list of all emissions units connected to the baghouse and a detailed explanation of how emissions are routed to it, including a description of any capture mechanism.
 - b. All records of the differential pressure readings taken at each baghouse in an Excel Workbook or other compatible format, including the date and time of the readings;
 - c. All daily, weekly, monthly and quarterly inspection, maintenance, and repair logs;
 - d. Documentation of how the emissions factors were derived and maximum hourly emission rates used by Quemetco to determine PM and lead emissions;
 - e. Any excess opacity or opacity deviation reports, including during periods of start-up, shut-down, and malfunction; and

23. Provide complete copies of all written correspondence, determinations, documents, or communications with IDEM from June 1, 2005, to the present, concerning the applicability of the Prevention of Significant Deterioration and/or non-attainment New Source review requirements to the construction and/or modification of any equipment at the Facility.
24. Provide the following information for the Hammer Mill, Rotary Kiln, Reverb Furnace, Secondary Arc Furnace, and Refining Kettles for all times that the emission units were operating during the period of June 2005 to the present. Provide this information in a Microsoft Excel Workbook or compatible format:
 - a. Monthly production in tons;
 - b. Monthly hours of operation;
 - c. Monthly average production rate (tons/hour); and
 - d. Monthly average tap-to-tap cycle time (furnaces only).

- f. The operating limits for the differential pressure across each baghouse, the method used to establish the values, and the effective date of these operating limits.
- 18. Provide the following information related to continuous temperature monitoring, from January 2014 to the present:
 - a. The minimum operating temperature, the method used to establish this value, and the effective date of these operating limits;
 - b. All records of the continuous temperature monitoring outputs and 3-hr average temperatures;
 - c. All records of corrective actions when temperature was below the minimum operating temperature;
 - d. Calibration & maintenance records; and
 - e. Performance evaluation records of the continuous monitoring systems (required by 40 C.F.R. § 63.8(e) and 40 C.F.R. § 63.548(j)(2)).
- 19. Provide a copy of all ventilation or engineering studies associated with identifying or reducing lead emissions performed from January 2000 to the present. Provide documents related to any physical or operational changes made by Quemetco based on the findings or recommendations of each study.
- 20. For all proposed ventilation or engineering studies associated with identifying or reducing lead emissions from January 2000 to the present, provide the proposed scope of work, and the planned start date for the study.
- 21. Identify and describe, in a chronologically organized table, all capital expenditures greater than \$25,000 commenced at the emission units, from June 1, 2005, to the present. This list must contain the approximate date each project (including maintenance projects and modifications) commenced, the date each project was completed or implemented, a brief description of each project, a list of expenses for each project, and the fixed capital cost of each project in nominal dollars. This should include, but not be limited to capital expenditures associated with changes in fuel type, fuel feed operations, transformers, oxygen lancing, raw material feed rates, production rates, emission rates, and/or air pollution control equipment.
- 22. For each project identified in Item 21, above, that cost more than \$50,000, provide copies of all capital appropriation requests, financial justifications, and authorizations, including attachments and addenda, generated by or prepared on behalf of the facility or its predecessors concerning that project.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A),(B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Request to Provide

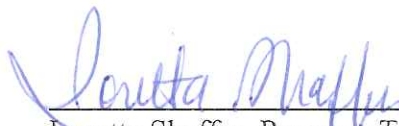
Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Shane Richardson
Environmental Manager
Quemetco, Inc.
7870 W. Morris Street
Indianapolis, Indiana 46231

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by First-Class Mail to:

Phil Perry, Chief
Air Compliance and Enforcement Branch
Indiana Department of Environmental
Management
100 N. Senate Ave.
Mail Code 61-53 IGCN 1003
Indianapolis, IN 46204-2251

On the 24 day of June 2015.



Loretta Shaffer, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7011150 0000 2640 5342